REMARKS

Claims 1-15 are pending in this application. By this Amendment, claim 6 is amended to correct an informality. No new matter is added. Reconsideration of the application based on the above amendment and the following remarks is respectfully requested.

Applicant appreciates the courtesies shown to Applicant's representatives by Examiners Vo and Poon in the July 9, 2007 personal interview. Applicant's separate record of the substance of the interview is incorporated into the following remarks.

The Office Action, on page 2, rejects claims 1-10 and 13-15 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,055,923 to Kitagawa et al. (hereinafter "Kitagawa"). The Office Action, on page 5, rejects claims 11 and 12 under 35 U.S.C. §103(a) as being unpatentable over Kitagawa in view of U.S. Patent No. 5,155,599 to Delabastita. These rejections are respectfully traversed.

Claims 1 and 13 recite, among other features, first vectors, each being either one of two screen vectors in the spatial frequency domain defined by basis vectors in two directions of a halftone dot pattern in the first-color or second-color halftone screen, are parallel to each other, and second vectors, each being the other one of the two screen vectors, are not parallel to each other. At least these features of the independent claims cannot reasonably be considered to be taught, or to have been suggested, by Kitagawa.

Kitagawa teaches, at col. 2, lines 15-41, that halftone dot elements are formed in a linear shape, and that those linear shapes can extend in various directions. Kitagawa further teaches, at col. 2, lines 59-60, that the centers of the halftone dots having linear shapes are located on the intersections of parallel lines which define lattice points of the screens. These lattices can be orthogonal lattices, such as depicted in Figs. 1A-1D of Kitagawa, or can be non-orthogonal lattices, such as depicted in Figs. 3A-3C of Kitagawa. The four halftone images I_{y1}, I_{m1}, I_{c1} and I_{k1}, which are overprinted to form an image are all defined by the same

orthogonal screen lattice (see col. 4, lines 35-46, in Kitagawa). Likewise, the reproduced image I_{t3} is produced by overprinting the three halftone images I_{m3}, I_{c3} and I_{k3} depicted in Figs. 3A, 3B and 3C, respectively (see col. 7, lines 54-65, in Kitagawa), which are all formed based on the same parallelogram lattice.

Kitagawa teaches, at col. 2, lines 56-63, that the centers of the halftone dots are located at the lattice points, *i.e.*, at the intersections of parallel lines forming the lattice. Kitagawa further teaches, at col. 7, lines 54-56, that the extensional directions of the respective halftone dots in the different halftone images are different from each other. During the personal interview, Examiner Vo asserted that the extensional directions A_{y1}, A_{m1}, A_{c1} and A_{k1} depicted in Figs. 1A-1D, respectively, can reasonably be considered to correspond to a basis vector or a screen vector, as positively recited in claims 1 and 13. This assertion is incorrect. Kitagawa teaches that all halftone images forming a reproduced image use the same screen lattice. Accordingly, the screen lattice used in each halftone image in a reproduced image can be defined by the same two vectors parallel to the lattice axes. In the case of the orthogonal lattice, the lattice axes are $S2_{y1}$, $S2_{m1}$, $S2_{c1}$ and $S2_{k1}$, in the x-direction and $S1_{y1}$, $S1_{m1}$, $S1_{c1}$ and $S1_{k1}$, in the y-direction. In the case of the parallelogram lattice, the lattice axes are $S2_{m3}$, $S2_{c3}$, and $S2_{k3}$, in the x-direction and $S1_{m3}$, $S1_{c3}$ and $S1_{k3}$, in a direction forming a 30° angle with the y-direction. Such vectors parallel to the lattice axes define screen vectors, as recited in the pending claims. The extensional directions, for example, A_{y1}, A_{m1}, A_{c1} and A_{k1}, cannot reasonably be considered to correspond to a basis vector for at least the reasons that they do not define the location of a lattice point. Instead, they define the orientation of a halftone dot placed on a lattice point. Such a teaching cannot reasonably be considered to correspond to the above-quoted features of claims 1 and 13.

Delabastita is not asserted in a manner to cure the deficiencies of Kitagawa, as discussed above.

For at least the above reasons, Kitagawa and Delabastita cannot reasonably be considered to have suggested the combinations of all of the features positively recited in at least independent claims 1 and 13. Further, claims 2-12, 14 and 15 also would not have been suggested by the applied references for at least the respective dependence of these claims on allowable independent claims 1 and 13, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-15 under 35 U.S.C. §§102(b) and 103(a) as being anticipated by, or unpatentable over, the applied references are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-15 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

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